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June 17, 2022

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**BY ECF**

Hon. Jesse M. Furman  
United States District Court  
Southern District of New York  
40 Centre Street, Room 2202  
New York, NY 10007

**Re: Herrara, et al. v. 12 Water Street Gourmet Café, Ltd., et ano.**  
**13 CV 4370 (JMF) (RLE)**

Your Honor:

Scott Korenbaum and I represent plaintiffs in this action brought pursuant to, among other things, the Fair Labor Standards Act ("FLSA"). The plaintiffs come before Your Honor requesting a two-week adjournment of our response to the application of Mohsin Zindani's counsel to reopen the judgment against him. This is our first request for this relief and Mohsin Zindani's counsel consents to this request. The application is presently due today, and if this request is granted it would be due on July 1, 2022.

A general release has been executed by the plaintiffs and provided to Mohsin Zindani's counsel. The two weeks will allow the attorneys to hopefully resolve any remaining issues.

We appreciate Your Honor's consideration of this request.

Application GRANTED. Plaintiffs shall file any opposition to Defendant's motion by **July 1, 2022**. Any reply shall be filed by **July 8, 2022**. Further extensions are very unlikely to be granted. The Clerk of Court is directed to terminate ECF No. 125. SO ORDERED.



June 21, 2022

Respectfully submitted,



David B. Rankin